



**Informal Interpretation Report  
Number 8557**



**Date** September 08, 2021

**Edition** 2021

**Section** C404.5.1

**Question:**

Is the intent that lavatories within patient room bathrooms in a hospital to be classified as Public Lavatory Faucets or Other Fixtures and Appliances?

**Answer**

No, when applying Table C404.5.1, patient room lavatories are not to be considered "Public Lavatory Faucets."

**Commentary:**

According to the definition of Public or Public Utilization in the FBC - Plumbing, "In the classification of plumbing fixtures, public applies to fixtures in general toilet rooms . . . . . where a number of fixtures are installed so that their utilization is similarly unrestricted." The intent is that "public" applies only to fixtures with unrestricted exposure to walk-in traffic.

The Florida Building Code, in Section 202 Definitions states: PUBLIC-USE AREAS. Interior or exterior rooms or spaces that are made available to the general public.

The intent is to make a difference between unfettered use or "man off the street use" and controlled use or admitted use such as would be a patient sleeping room and toilet/shower inside a hospital. This area is certainly not "made available to the general public".

Therefore, a patient sleeping room and toilet room inside of a hospital or nursing home would fall into the "Other" category regarding the Table C404.5.1.

There are additional requirements for hospitals that are located in Florida by reference from Chapter 4, Section 449 Hospitals to the FGI Guidelines for the Design and Construction of Hospitals which is referenced in FBC Chapter 35.

There is more information on the design and construction of hot water systems in hospitals in Chapter 2.1-8 and there is also this specific requirement that may be germane to the discussion:

#### 2.1-8.4.2.5 Heated potable water distribution systems

(2) Heated potable water distribution systems serving patient care areas shall be under constant recirculation to provide continuous hot water at each hot water outlet. Non-recirculated fixture branch piping shall not exceed 25 feet (7.62 meters) in length.

This requirement, and others if they apply, would take precedence over the Florida Energy Code since it is a direct reference from Section 449 in Chapter 4 as stated in Section 401:

401.2.2 General. Where in any specific case, Sections 449 through 469 specify different materials, methods of construction, design criteria or other requirements than found in this code, the requirements of Sections 449 through 469 shall be applicable.

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#### **Notice:**

The Building Officials Association of Florida, in cooperation with the Florida Building Commission, the Florida Department of Business & Professional Regulation, ICC, and industry and professional experts offer this interpretation of the Florida Building Code in the interest of consistency in their application statewide. This interpretation is informal, non-binding and subject to acceptance and approval by the local building official.